EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION **This Document Relates to All Actions**	MDL No. 2875 Honorable Robert B. Kugler, District Court Judge

DECLARATION OF ANTHONY R. BINSOL

I, Anthony R. Binsol, hereby declare as follows:

1. I currently serve as Senior Director/Compliance Lead, Quality Operations Solids Manufacturing Supply Operations for Teva Pharmaceuticals USA, Inc., which is part of the Global Quality Department. The Global Quality Department is responsible for the oversight and continuous improvement of various Quality Systems at Teva, including Lifecycle Management of Teva's corporate standards, policies, and guidance documents; Quality Risk Management; Management of Supplier Quality; Recalls; Quality Metrics; Data Integrity; and Site Inspection Readiness, among other systems.

2. I have personal knowledge of the matters stated herein as it relates to Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis, LLC, and Actavis Pharma, Inc., (collectively, the "Teva Defendants" or "Teva"). I submit this declaration in support of the Teva Defendants' Motion to Seal Exhibits to Plaintiffs' Motion for Class Certification of Consumer Economic Loss Claims

(Dkt. 1748) Pursuant to Local Civil Rule 5.3(c).

3. I have reviewed each of the below documents attached as Exhibits to Plaintiffs' Motion for Class Certification of Consumer Economic Loss Claims (Dkt. 1748). These documents include internal investigation reports and other documents that (a) provide information about Teva's internal reporting and investigative processes; (b) are competitively sensitive as they comment on the Teva's evaluation of various suppliers; (c) provide information on Teva's internal toxicology and risk assessment processes; and/or (d) provide information about Teva's internal reporting and audit processes. The above-referenced documents contain non-public, highly sensitive commercial information, which would cause significant competitive harm to Teva and competitive advantage to Teva's competitors, as outlined below, if publicly disclosed.

4. TEVA-MDL2875-00049024 (attached as **Exs. 16 and 67** to Dkt. 1748), Investigation Report For gDR# 1336473 (July 2, 2019), is an internal investigation report that provides information concerning Teva's internal reporting, investigative processes, and corrective and preventive actions taken related to the NDMA and NDEA impurities discovered in Valsartan API manufactured by a Teva supplier. This document further provides comments on Teva's evaluation of a supplier that may be competitively sensitive. The disclosure of this document would cause irreparable harm to Teva by providing its competitors with direct insight into Teva's

internal processes for investigating, evaluating, correcting, and mitigating the presence of the nitrosamine impurity in Valsartan. The generic pharmaceutical industry is highly competitive on internal strategies and processes, both of which are implicated by this document and many of the documents at issue. The disclosure of this document would allow Teva's competitors to identify, replicate, and undercut Teva's internal investigation processes and business strategies, and thereby cause significant competitive harm.

5. TEVA-MDL2875-00549883 (attached as **Ex. 66** to Dkt. 1748), Global Quality Report: 2018-GQ-020-1v1, is an internal investigation report that provides information about Teva's internal investigative processes and strategies for corrective and preventive actions taken related to the NDMA and NDEA impurities discovered in Valsartan API manufactured by a Teva supplier. This document also provides comments on Teva's evaluation of a supplier that may be competitively sensitive. The disclosure of this document would cause irreparable harm to Teva by providing its competitors with direct insight into Teva's internal processes for investigating, evaluating, correcting, and mitigating the presence of nitrosamine impurities in Valsartan. The disclosure of this document would allow Teva's competitors to identify, replicate, and undercut Teva's internal processes and business strategies, thereby causing significant competitive harm.

6. TEVA-MDL2875-00020519 (attached as **Ex. 72** to Dkt. 1748) is an

internal communication that reveals Teva's internal toxicology and risk assessment processes related to the presence of NDMA in Valsartan API. This document also provides comments on Teva's evaluation of a supplier that may be competitively sensitive. The disclosure of this document would cause irreparable harm to Teva by providing its competitors with direct insight into Teva's internal thought processes concerning a toxicology assessment and risk assessment related to the presence of nitrosamine impurities in Valsartan. The disclosure of this document would reveal the thought processes of Teva's leadership and allow Teva's competitors to identify, replicate, and undercut Teva's internal processes and business strategies, thereby causing significant competitive harm.

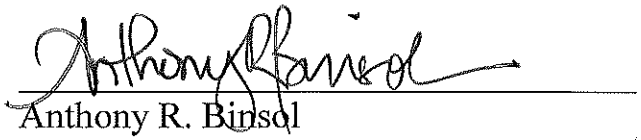
7. TEVA-MDL2875-00522655 to TEVA-MDL2875-00522660 (attached as **Ex. 88** to Dkt. 1748) is an internal communication that discusses preparation of an audit report and provides information about Teva's internal reporting and audit processes. This document also comments on Teva's internal evaluation of a supplier that may be competitively sensitive. The disclosure of this document would cause irreparable harm to Teva by providing its competitors with the internal thought processes of Teva leadership concerning an internal audit as well as Teva's internal reporting processes. This would allow Teva's competitors to identify, replicate, and undercut Teva's internal processes and business strategies, thereby causing significant competitive harm.

8. TEVA-MDL2875-00400391 to TEVA-MDL2875-0040000 (attached as **Ex. 90** to Dkt. 1748) is an internal communication that discusses preparation of an audit report and provides information about the Teva Defendants' internal reporting and audit processes. This document also comments on Teva's internal evaluation of a supplier that may be competitively sensitive. The disclosure of this document would cause irreparable harm to Teva by providing its competitors with the internal thought processes of Teva leadership concerning an internal audit and Teva's audit processes and internal reporting. This would allow Teva's competitors to identify, replicate, and undercut Teva's internal processes and business strategies, thereby causing significant competitive harm.

9. TEVA-MDL2875-00042885 to TEVA-MDL2875-00042887 (attached as **Ex. 97** to Dkt. 1748) is an internal communication discussing the internal assessments of processes in place at Teva for toxicology and risk assessments. The disclosure of this document would cause irreparable harm to Teva by providing its competitors with the internal thought processes of Teva leadership concerning the processes in place for toxicology and risk assessment, as well as evaluation of corrective and preventive action in response to the presence of nitrosamines in Valsartan. The public disclosure of this document would allow Teva's competitors to identify, replicate, and undercut Teva's internal processes and business strategies, thereby causing significant competitive harm.

I, Anthony R. Binsol, declare under penalty of perjury that the foregoing is true and correct.

Executed on 29 November, 2022



Anthony R. Binsol

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